RCRA CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

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Agency: MDNR - Hazardous Waste Program
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Background Facility Information

Facility Name: McDonnell Douglas Tract I
EPA Identification No.: MOD 000818963
Location (City, State): Hazelwood, Missouri
NCAPS Priority Rank: Medium

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Please explain.
Entire facility. RFA identified 32 SWMUs at the facility during the file review and VSI.

STATUS OF CORRECTIVE ACTION ACTIVITIES AT THE FACILITY

2. What is the current status of HSWA corrective action activities at the facility? (check all that apply)

( ) No corrective action activities initiated
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Sampling (RFS) completed
( ) RCRA Facility Investigation (RFI) completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

(X) Operating permit
( ) Post-closure permit
( ) Enforcement order
(X) Other (describe) The operating permit is is scheduled for 4/96, but has not yet been finalized.

4. Have interim measures, if required or completed (see Question 2), been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway
(X) Not Applicable

CONTINUE TO QUESTION 5 ONLY IF THE FOLLOWING CONDITIONS ARE MET:

- The facility has been ranked using the National Corrective Action Prioritization System (NCAPS);

AND

- Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.

FACILITY RELEASES AND EXPOSURE CONCERNS

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

(X) Groundwater
(X) Surface water
( ) Air
(X) Soil
( ) Sediment

6. Are contaminant releases migrating offsite?

( ) Yes; Indicate media, concentrations, and level of certainty. _____
( ) No
(X) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes
(X) No
( ) Uncertain

7b. Is there a potential for human exposure to contaminants released from the facility over the next five to ten years?

( ) Yes
( ) No
(X) Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes
( ) No
(X) Uncertain

8b. Is there a potential that environmental receptors could be exposed to contaminants released from the facility over the next five to ten years?

( ) Yes
( ) No
(X) Uncertain

ANTICIPATED FINAL CORRECTIVE MEASURES

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
( ) No
(X) Not Applicable

Additional explanatory notes: _____

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes: Current stabilization activities planned are structural upgrades to active SWMUs, decreasing the potential for future releases from these units.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes: Due to the limited amount of site-specific information currently available, this question can not be definitively answered.

TECHNICAL ABILITY TO IMPLEMENT STABILIZATION ACTIVITIES

12. In what phase(s) are contaminants known to exist under ambient site conditions?

(X) Solid
( ) Light non-aqueous phase liquids (LNAPLs)
( ) Dense non-aqueous phase liquids (DNAPLs)
(X) Dissolved in groundwater or surface water
( ) Gaseous
( ) Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
(X) Polynuclear aromatics (PAHs)
( ) Pesticides
(?) Polychlorinated biphenyls (PCBs) and/or dioxins
(X) Other organics
(X) Inorganics and metals
( ) Explosives
( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? (See Attachment A for a listing of potential stabilization technologies.)

(X) Yes: Indicate possible course of action.
Hydrocarbon releases, including the presence of laterally migrating soil gas, could be stabilized by air sparging in conjunction with SVE or BioVenting. Groundwater treatment could include P&T, air stripping, slurry/grout injection and/or in-situ biodegradation.

( ) No: Indicate why stabilization technologies are not appropriate. _____

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
(X) No

If No, should efforts be made to obtain this data in advance of the data needed to implement final corrective measures?

(X) Yes
( ) No

TIMING AND OTHER PROCEDURAL ISSUES ASSOCIATED WITH STABILIZATION

16. Considering all technical and administrative factors, would it be environmentally beneficial to pursue implementation of stabilization activities more quickly than the final corrective measures?

(X) Yes
( ) No

Additional explanatory notes: Current stabilization efforts planned at the facility correlate to SWMU containment and material integrity improvements. Contaminant stabilization will be evaluated during the continuing corrective action process.

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes
( ) No
( ) Uncertain

Additional explanatory notes: _____

CONCLUSION

18. Is this facility an appropriate candidate for stabilization activities?

(X) Yes (YE)
( ) No, not feasible (NF)
( ) No, not required (NR)
( ) Insufficient information (IN)

Explain final decision, using additional sheets if necessary.
The extent and severity of releases at the facility has yet to be defined. During the RFA, some SWMUs were verified to have releases as identified from the sampling visit stage. The extent of these releases are not known, therefore the need for stabilization will not be fully identified until the facility nears completion of the RFI and reviews the data generated during this investigation. However, stabilization activities, including active SWMU upgrades, are currently stipulated within the draft operating permit for this facility.

Stabilization Measures Evaluation
RCRIS Status Codes Explanation

YE = Facility is amenable to stabilization activity based on status of corrective action work, technical factors, degree of risk and timing/administrative considerations.

NF = Facility is not amenable to stabilization activity at the present time because it appears to be technically infeasible or inappropriate.

NR = Facility is not amenable to stabilization activity at the present time for reasons other than it appears to be technically infeasible or inappropriate (NF) or there is a lack of technical information (IN). Reasons for this may be the status of closure at the facility, the degree of risk, timing considerations, the status of corrective action work at the facility, or other administrative considerations.

IN = Facility is not amenable to stabilization activity because of a lack of technical data. An evaluation has been completed but further data is necessary to determine stabilization measures feasibility or appropriateness. This status should be changed when data becomes available.